

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

J & J SPORTS PRODUCTIONS, INC.,

Plaintiff,

v.

ALEX MATOV, and OASIS COMMUNITY
CENTER, INC,

Defendants.

Case No.1:16cv11864DPW

**EMERGENCY MOTION TO
CONTINUE DECEMBER 15, 2016
SCHEDULING CONFERENCE**

Plaintiff J & J SPORTS PRODUCTIONS, INC. hereby moves, with Defendant Alex Matov's consent, and on an emergency basis as this motion concerns a conference with the Court scheduled for 11:00 a.m. on December 15, 2016, to continue the Scheduling Conference set for December 15, 2016 to a date after the time to complete briefing of the two pending motions filed in this matter.

This motion is made on the grounds that on (1) December 9, 2016, Defendant Alex Matov filed a Motion For Sanctions And For Attorney's Fees with a December 23, 2016 opposition deadline, (2) on December 14, 2016, Plaintiff J & J Sports Productions, Inc. filed a Motion For Voluntary Dismissal with a December 28, 2016 opposition deadline, (3) anticipating the Court will exercise its discretion and dismiss this action on terms and conditions it deems just and proper, there is no further pretrial dates to be scheduled in this action, and (4) both motions and any other matters could be addressed in a single continued conference and hearing date after December 28, 2016.

This motion is supported by the accompanying Affidavit of Patricia A. Szumowski.

For the reasons set forth, Plaintiff respectfully requests the Court allow this motion and continued the December 15, 2016 Scheduling Conference to a date after December 28, 2016.

CERTIFICATION

Pursuant to Local Rule 7.1(a)(2), on December 14, 2016, I telephoned defense counsel Valentin Gurvits and left a voice message requesting assent to this motion; and, thereafter, I emailed Attorney Gurvits a copy of this motion for his consideration. Counsel for Alex Matov reports Mr. Matov consents to Plaintiff's request for continuation of the Scheduling Conference.

Plaintiff J & J SPORTS PRODUCTIONS, INC.

Dated: December 14, 2016

By: /s/ Patricia A. Szumowski
PATRICIA A. SZUMOWSKI BBO #653839
Attorney for Plaintiff
SZUMOWSKI LAW, P.C.
417 West St., Ste. 104
P.O. Box 2537
Amherst, MA 01004
Telephone: (413) 835-0956
pas@szumowskilaw.com

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on the NEF.

Dated December 14, 2016

/s/ Patricia A. Szumowski
Patricia A. Szumowski